

CRAIG H. MISSAKIAN (CABN 125202)
United States Attorney

MARTHA BOERSCH (CABN 126569)
Chief, Criminal Division

ERIC CHENG (CABN 274118)
ALETHEA M. SARGENT (CABN 288222)
ALEXANDRA SHEPARD (CABN 205143)
Assistant United States Attorneys

1301 Clay Street, Suite 340S
Oakland, California 94612
Telephone: (510) 637-3680
FAX: (510) 637-3724
Eric.Cheng@usdoj.gov
Alethea.Sargent@usdoj.gov
Alexandra.Shepard@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:23-CR-00267 JSW
Plaintiff,)	
v.)	JOINT STATUS REPORT AND STIPULATION TO
)	VACATE STATUS, SET SENTENCING
TIMOTHY ALLEN MANLY WILLIAMS,)	HEARING, AND REFER TO PROBATION FOR A
Defendant.)	PRESENTENCE REPORT; AND [PROPOSED]
)	ORDER

UNITED STATES OF AMERICA,)	CASE NOS. 4:23-CR-00268 JSW-1
Plaintiff,)	4:24-CR-00502 JSW
v.)	
)	JOINT STATUS REPORT AND STIPULATION TO
DANIEL JAMES HARRIS,)	VACATE STATUS, CONSOLIDATE AND SET
Defendant.)	SENTENCING HEARING, AND REFER TO
)	PROBATION FOR A PRESENTENCE REPORT;
)	AND [PROPOSED] ORDER

STIPULATION AND PROPOSED ORDER

1 UNITED STATES OF AMERICA,

2 Plaintiff,

3 v.

4 ERIC ALLEN ROMBOUGH,

5 Defendant.

) CASE NO. 4:23-CR-00269 JSW-2

) JOINT STATUS REPORT AND STIPULATION TO
) VACATE STATUS, SET SENTENCING
) HEARING, AND REFER TO PROBATION FOR A
) PRESENTENCE REPORT; AND [PROPOSED]
) ORDER

8 Each of the above-captioned cases are set for status conference hearings on October 7, 2025.

9 Defendant Timothy Allen Manly Williams pleaded guilty to destruction, alteration, and
10 falsification of records in federal investigations; obstruction of official proceedings; and deprivation of
11 rights under color of law on November 28, 2023. Defendant Manly Williams testified in *United States*
12 *v. Morteza Amiri*, Case No. 23-CR-269 JSW-1 in March 2025.

13 Defendant Daniel James Harris pleaded guilty to conspiracy to distribute anabolic steroids;
14 possession of anabolic steroids with the intent to distribute; and attempted possession of anabolic
15 steroids with the intent to distribute in case number 23-CR-00268 JSW-1; and pleaded guilty to bank
16 fraud in case number 24-CR-00502 JSW; on September 17, 2024. Defendant Harris testified in *United*
17 *States v. Devon Wenger*, Case No. 23-CR-268 JSW-2 in April 2025.

18 Defendant Eric Allen Rombough pleaded guilty to conspiracy against rights and deprivation of
19 rights under color of law on January 14, 2025. Defendant Rombough testified in *United States v.*
20 *Morteza Amiri*, Case No. 23-CR-269 JSW-1 in March 2025 and *United States v. Devon Wenger*, Case
21 No. 23-CR-269 JSW-3 in September 2025.

22 Since the setting of the October 7, 2025 status conference hearings, Devon Wenger was
23 convicted at trial in *United States v. Devon Wenger*, Case No. 23-CR-269 JSW-3 and his consolidated
24 sentencing hearing has been set for December 2, 2025.

25 The parties in the above-captioned cases are therefore ready to set sentencing hearings and the
26 parties stipulate and agree that, with the Court's permission, the currently-scheduled status conference
27 hearings be vacated and sentencing hearings be set (including by consolidating proceedings for
28 Defendant Harris in 23-CR-00268 JSW-1 and 24-CR-00502 JSW for purposes of sentencing) on

STIPULATION AND PROPOSED ORDER

1 **January 13, 2026.** The parties also stipulate and agree that the Court refer each of the defendants to
2 United States Probation for preparation of presentence investigation reports in advance of sentencing.

3 The undersigned Assistant United States Attorney certifies that he has obtained approval from
4 the undersigned to file this stipulation and proposed order.

5 **IT IS SO STIPULATED.**

6 DATED: September 29, 2025

7 /s/
ERIC CHENG
ALETHEA SARGENT
ALEXANDRA SHEPARD
Assistant United States Attorneys

10 /s/
RANDY SUE POLLOCK
Counsel for Defendant TIMOTHY ALLEN
MANLY WILLIAMS

14 /s/
JAMES P. VAUGHNS
Counsel for Defendant DANIEL JAMES HARRIS

17 /s/
ANTHONY BRASS
Counsel for Defendant ERIC ALLEN
ROMBOUGH

[PROPOSED] ORDER

Based upon the facts and representations set forth in the stipulation of the parties, and good cause shown, IT IS HEREBY ORDERED as follows:

- The status conference hearings set for October 7, 2025 in each of the above-captioned matters shall be VACATED;
- Sentencing for Defendant **Timothy Allen Manly Williams** in Case No. 23-cr-00267 JSW shall be set on **January 13, 2026, at 1:00 p.m.**; the Court also refers this Defendant to United States Probation for preparation of a presentence investigation report;
- Regarding Defendant **Daniel James Harris**, the Court CONSOLIDATES Case Nos. 23-CR-00268 JSW-1 and 24-CR-00502 JSW for purposes of sentencing, and a sentencing hearing for both cases shall be set on **January 13, 2026, at 1:00 p.m.**; the Court also refers this Defendant to United States Probation for preparation of a single presentence investigation report applying to both cases;
- Sentencing for Defendant **Eric Allen Rombough** in Case No. 23-cr-00269-2 shall be set on **January 13, 2026, at 1:00 p.m.**; the Court also refers this Defendant to United States Probation for preparation of a presentence investigation report.

IT IS SO ORDERED.

DATED: _____

HON. JEFFREY S. WHITE
United States District Judge